

**UNITED STATES BANKRUPTCY COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

| | | |
|------------------------------|---|--------------------------------|
| IN RE: | : | CHAPTER XIII |
| | : | |
| DUNG TRUNG DUONG | : | 1:24-02660 |
| dba D-NAILS | : | |
| Debtors | : | |
| <hr/> | | |
| M&T BANK | : | |
| Movant | : | |
| | : | |
| vs. | : | |
| | : | |
| DUNG TRUNG DUONG | : | |
| dba D-NAILS | : | |
| Debtor | : | |
| And | : | |
| TRANG T. PHAM | : | |
| JACK N. ZAHAROPOULOS ESQUIRE | : | 11 U.S.C. Section 362 and 1301 |

ANSWER TO MOTION FOR RELIEF

NOW COMES the Debtor, DUNG TRUNG DUONG, by and through her attorney, Charles E. Petrie, and respectfully answers as follows:

1. Admitted.
2. Admitted.
3. Admitted.
4. Admitted.
5. Admitted.
6. Admitted.
7. Denied. Debtor has made or will make all outstanding post-petition payments.
8. After reasonable investigation, Debtor is without sufficient information to admit or deny the allegations in paragraph 7.

9. Denied. It is denied that Movant is entitled to relief from the Automatic Stay.

10. Denied. It is denied that Movant is entitled to reimbursement of legal fees and costs associated with this action.

11. Denied. It is denied that Movant has cause to seek reimbursement of any amounts.

WHEREFORE, Debtor respectfully requests that Your Honorable Court dismiss Movant's Motion for Relief.

/s/ Charles E. Petrie
CHARLES E. PETRIE
3528 Brisban Street
Harrisburg, PA 17111
(717) 561-1939
Attorney for Debtor

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CERTIFICATE OF SERVICE

I, CHARLES E. PETRIE, ESQUIRE, do hereby certify that on this date, I served a true and correct copy of the within Answer, in the above-captioned matter upon the following individual(s), by United States first-class mail, postage prepaid, addressed as follows, or by electronic means:

STEPHAN ESQUIRE
KML LAW GROUP OC
BNY MELLON INDEPENDENCE CENTER
701 MARKET STREET SUITE 5000
PHILADELPHIA, PA 19106

CHARLES J. DeHART, III, ESQUIRE, TRUSTEE
8125 ADAMS DRIVE SUITE A
HUMMELSTOWN PA 17036

DATE: 04/28/2025

/s/ Charles E. Petrie
CHARLES E. PETRIE
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ID# 29029